

EXHIBIT E

Christina Henry

From: Christina Henry
Sent: Tuesday, February 23, 2021 3:38 PM
To: rnorman@houser-law.com; 'johnm@schweetlaw.com'; Joseph McIntosh
Subject: Hoover v QLS
Attachments: 2nd Set of Rogs and RFPs -NewRez.pdf; Hoover - 2nd set - Rogs and RFPs PHH.pdf; Hoover - 2nd set Rogs and RFPs -HSBC.pdf; 30(b)(1) Notice of Depo - HSBC.pdf; 30(b)(1) Notice of Depo - NewRez.pdf; 30(b)(1) Notice of Depo - PHH.pdf

Counsels,

Please see the attached discovery or punitive damages and notices of Rule 30(b)(1) depositions set for March 25th and March 26th. We would like to minimize expenses and request that you work to identify suitable witnesses ASAP. Trial is coming up quickly and we are concerned with substance over form here given that trial is coming up quickly and thus have set these depositions to target the persons most likely to have the relevant information. However, if you would rather have your rule 30(b)(6) be the deponent we are also open to having those discussions.

In light of the trial date that is fast approaching, we would like to engage now in fashioning an agreement over the timeline for punitive damages discovery as directed by the court. We have moved quickly to get this out to you so that we can engage in that discussion. Please let us know by Thursday the 25th by the close of business if you have any concerns or if you need to move the dates for the deposition to accommodate the deponents. Also, should we need to further meet and confer, I would like to propose Friday morning at 10am if that is agreeable about all of these topics.

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